

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR- 80219-RLR

UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
MICHAEL GORDON DOULGAS, )  
a/k/a "DaddyBreendsFam," )  
a/k/a "Michael," )  
 )  
Defendant. )  
\_\_\_\_\_ )

**GOVERNMENT'S THIRD RESPONSE TO  
THE STANDING DISCOVERY ORDER**

The United States hereby files this third response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

- A. 5. Books, papers, documents, data, photographs, tangible objects, buildings or places, within the government's possession, custody or control, which are material to the preparation of the defendant's defense, or which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected at a mutually convenient time at: the Office of the United States Attorney, 500 A. Australian Ave., West Palm Beach, Florida, Suite 400. Please call the undersigned within 48 hours if you intent to review the evidence to set up a date and time that is convenient to both parties.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, data, etc., that the government may intend to introduce at trial.

- B. DEMAND FOR RECIPROCAL DISCOVERY: Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules

of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

The attachments to this response have been uploaded to USAfX in a folder entitled, “Douglas Discovery, RSOD 3”, and made available via secured link to defense counsel identified below, and includes one (1) .PDF file entitled: “US v. Douglas, 23CR80219-CANNON, RSDO3, Bates Numbers 01142 - 01152; and one (1) .MP3 audio file entitled, “Adrian C. - HSI Interview 07-19-24.mp3”

Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 22, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the attached Service List in the manner specified.

s/Gregory Schiller  
Gregory Schiller  
Assistant United States Attorney

**SERVICE LIST**

United States v. MICHAEL GORDON DOULGAS  
Case No. 23-CR- 80219-RLR  
United States District Court  
Southern District of Florida

<b>Party</b>	<b>Counsel</b>
Plaintiff: United States	Gregory Schiller Assistant United States Attorney 500 S. Australian Ave., Suite 400 West Palm Beach, FL 33401 Email: gregory.schiller@usdoj.gov <b>via Notice of Electronic Filing generated by CM/ECF</b>
Defendant: Eric Raymond Bahre	John D. Kirby, Esq. The Law Office of John D. Kirby 401 West A. Street, Suite 1150 San Diego, CA 92101  John R. Howes, Esq. Howes Law Group, P.A. 110 SE 6 <sup>th</sup> St., Suite 1700 Ft. Lauderdale, FL 33301 Email: FloridaLawyer@outlook.com <b>via Notice of Electronic Filing generated by CM/ECF</b>